

TIMOTHY COURTNEY, individually and on behalf of all others similarly situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER SOLUTIONS, INC. d/b/a FBCS, INC.,

Defendant.

ONIEQUE MORGAN, individually and on behalf of all others similarly situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-02153-KSM

CLASS ACTION

Case No. 2:24-cv-02163-NIQA

CLASS ACTION

**DEFENDANT FINANCIAL BUSINESS AND CONSUMER SOLUTIONS, INC.’S
RESPONSE TO COORDINATED PLAINTIFFS’ AMENDED MOTION TO
CONSOLIDATE CASES AND APPOINT INTERIM CO-LEAD CLASS COUNSEL**

Defendant Financial Business and Consumer Solutions, Inc. (“FBCS”), has reviewed Coordinated Plaintiffs’ Amended Motion to Consolidate Cases and Appoint Interim Co-Lead Class Counsel (the “Amended Motion to Consolidate”) (DI. 8) and does not oppose the portion of the Amended Motion to Consolidate seeking consolidation of the fourteen (14) above-captioned actions, as well as any future related actions that may be filed in, or transferred or removed, to this Court, under the docket of the first-filed *Reichbart* Action (No. 2:24-cv-01876-NIQA). FBCS has filed, or will file, motions to stay responsive pleading deadlines pending resolution of the Amended

Motion to Consolidate in each of the above-captioned actions, virtually all of which FBCS has confirmed to be unopposed. FBCS respectfully requests that, following the resolution of the Amended Motion to Consolidate, the Court allow the parties to confer and report to the Court with a proposed schedule governing responsive pleading deadlines.

At this juncture, and in light of the early stage of the proceedings and the number of pending actions and counsel, FBCS takes no position on the portion of the Amended Motion to Consolidate seeking the appointment of Interim Co-Lead Counsel and Liaison Counsel (together, “Proposed Class Counsel”). FBCS reserves the right to revisit its stance on Proposed Class Counsel at a later date.

Dated: May 24, 2024

BAKER & HOSTETLER LLP

/s/ Nathalie A. Freeman

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*Attorneys for Defendant Financial Business
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CERTIFICATE OF SERVICE

I, Nathalie A. Freeman, hereby certify that on this 24rd day of May, 2024, I caused a true and correct copy of the foregoing Response to Coordinated Plaintiffs' Amended Motion to Consolidate Cases and Appoint Interim Co-Lead Class Counsel to be served via CM/ECF and email on the following counsel of record:

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Dated: May 24, 2024

/s/ Nathalie A. Freeman
Nathalie A. Freeman

*Attorney for Defendant Financial Business
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